



KREINDLER & KREINDLER LLP | 485 Lexington Avenue | New York, NY 10017-2629

office: 212.687.8181 | fax: 212.972.9432 | www.kreindler.com

September 28, 2021

Via ECF/CM

The Honorable Sarah Netburn
United States Magistrate Judge
Thurgood Marshall Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)
(Ashton 02-cv-6977 only)

Dear Judge Netburn:

Kreindler & Kreindler (Kreindler) is writing the Court, as set forth in our September 27, 2021 letter, ECF No. 7147, to provide a further report on our efforts to protect against any future release of confidential designated material from our files. In addition, Kreindler asks the Court to formally recognize the roles of two Kreindler attorneys working on behalf of the Plaintiffs represented by the Plaintiffs' Executive Committee (PEC) in lieu of two Kreindler attorneys on the original Case Management Order 3 establishing committees. ECF No. 248-2.

Kreindler can report that it has moved all 9/11 case protected materials into a separate file on its computer system. Access to that file is now strictly limited to Kreindler lawyers and staff working on the 9/11 case. Kreindler is also in the process of setting up a new system that will automatically track the viewing and download of all documents on the system. This will permit us to have a means to check on the use of any documents by users of the system. For the time being, until we can establish our new system, we have directed the lawyers and staff working on the case to keep a log of all documents that they access.

Also, we now ask the Court to formally endorse the roles of the following individual attorneys at Kreindler & Kreindler LLP fulfilling the responsibilities of the positions on the PEC established in Case Management Order 3 (CMO 3), ECF No. 248-2 at ¶¶ 5 – 6, specifically:

1. as a member of the PEC for Personal Injury and Death Claims: Steven R. Pounian of Kreindler & Kreindler LLP will replace Justin T. Green of Kreindler & Kreindler LLP; and
2. as a member of PEC for Personal Injury and Death Claims: Megan Wolfe Benett of Kreindler & Kreindler LLP will replace Marc S. Moller of Kreindler & Kreindler LLP.

September 28, 2021

Page 2

As the Court likely knows from many judicial filings and appearances, this would simply formalize the roles the individuals above have effectively been performing for several years. We therefore respectfully ask that this Court so-order this request, modifying CMO 3 to reflect the changes described above.

Respectfully,

/s/ Megan Wolfe Benett

KREINDLER & KREINDLER LLP

485 Lexington Avenue

New York, New York 10017

Tel.: 212-687-8181

Email: mbenett@kreindler.com